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****Please make an independent determination whether use of these forms is appropriate****

UNITED STATES DISTRICT COURT
DISTRICT OF NORTH DAKOTA

Kermit Ty Poulson

(Enter full name of each Plaintiff, above)

vs.

NORTH DAKOTA Dept of
Human Services,
Julie Hoffman

(Enter full name of each Defendant, above)

Civil Case No. _____
(To be assigned by Clerk of Court)

§ JURY TRIAL DEMANDED ☒ Yes ☐ No
(Check one)

COMPLAINT

I. JURISDICTION. State the grounds for filing this case in Federal Court (include federal statutes or U.S. Constitutional provisions).

SAMPLE COMPLAINT
SHALEESHA KARPYAK NEVER ABANDONED MARISOL MIA Ferrari, THE STATE ALLEGES Abandon to mean UNDER chapter 14-15 1(b)(1). SHALEESHA with care left MARISOL WITH Alydia Ferrari, for A BUSINESS ART TRIP TO San Francisco, while there she was ASSAULTED, AND she suffered A Head Injury. she was delayed in getting BACK But she DID NOT "Abandon" MARISOL. PURSUANT TO 14-15-03, (2), an unmarried Adult can ADOPT MARISOL. Since Julie performed an illegal ACTION, SHALEESHA was terminated and not ALLOWED Recourse as she as an unmarried ADULT can ADOPT MARISOL. THE STATE VIOLATED the LAW, SHALEESHA NEVER ABANDONED HER, SHALEESHA explained her prolonged Absence, and the Circumstances THAT Arose in San Francisco; I got her to

(Continued)

come Back to Montana, and this matter was done in an illegal manner, Shaleesha did not give consent, and was not asked by Social Services, because C.P.S. and the state took advantage of a mother with a head injury and although Montana illegally terminated my rights upon which I sued in Poulson v. Bullock; CV-17-140-DLC-JCL, and Poulson v. Karpyak for slander and ADA violations, consent of the Biological Father is still required. (14-15-05(b)(7), my rights were illegally terminated by Bob Allison in Montana when Shaleesha's lawyer used slander and defamation to say that Mr. Poulson "cannot be a father because he drags his feet." I sued them in Federal court, and an ableist judge Jeremiah C. Lynch, threw it out with prejudice, as he was an ableist, and allowed for violations of the ADA. I have explained this to Julie Hoffman and I just want to communicate with the family and my biological daughter because injustices have been done to me, I want Julie Hoffman to appeal the validation of the adoption decree, because Shaleesha never gave consent, and Julie Hoffman's investigation was not conducted properly. Shaleesha told me that the state just "took Marisol" without her consent. Julie Hoffman has failed to listen to me, and hangs up on me, and she will not talk to Shaleesha, and being left in the care of her sister Alydia does not meet the term "ABANDON" Shaleesha had no knowledge of a relinquishment order, and she was recovering from a traumatic brain injury, and the state never conducted a proper procedure, and assumed Shaleesha abandoned Marisol, even though she didn't, Shaleesha had no idea, and Julie Hoffman

Fails to TALK TO HER, W I ABOUT THE improper procedure, THE STATE OF NORTH DAKOTA DID TO REMOVE MARISOL FROM SHALEESHA KARP YAK.
Defendant

II. ~~PLAINTIFF~~ For each Plaintiff list: name and address including City, County and State.

1. STATE OF NORTH DAKOTA Dept. of Human Services
600 E. BOULEVARD Ave, Dept. 325
BISMARCK, ND 58505

2. Julie Hoffman
600 E. Boulevard Ave Dept 325
BISMARCK, ND 58505

Plaintiff
III. ~~DEFENDANT~~ For each Defendant list: name and address including City, County and State.

1. Kermit Ty Poulson
1520 E. Burdick Expressway
MINOT, ND 58701

2. ~~SHALEESHA KARP YAK~~
~~1111 11TH ST SW~~
~~WATFORD CITY, ND 58854~~

3. ~~JO-ANNE GARMANN~~
~~1111 11TH ST SW~~
~~WATFORD CITY, ND 58854~~

4. ~~Alydia Ferrari~~
~~1111 11TH ST SW, WATFORD CITY, ND 58854~~

IV. CLAIM. State the facts of your claim. Include the name of each person involved, dates and places. Be as specific as possible. Do not give any legal argument or cite any cases or statutes. Use additional sheets of paper if necessary.

JULIE HOFFMAN PERFORMED AN ILLEGAL STATE ADOPTION, WITHOUT SHALEESHA'S CONSENT, AND DID NOT CONDUCT A PROPER INVESTIGATION, AND LIED ABOUT SHALEESHA "ABANDONING" MARISOL WITH HER SISTER MYDIA. THE STATE HAS BEEN EXHAUSTED, AS JULIE HOFFMAN REFUSES TO ADDRESS THIS, AND WHO REFUSES TO LISTEN, AND WHO WILL NOT TELL ME THE JUDGE, OR THE COURT, TO ADDRESS THIS ILLEGAL MANEUVER, JULIE ALSO KNOWS THE STATE OF MONTANA ILLEGALLY TERMINATED MY RIGHTS, BASED OFF OF SLANDER, AND DELAMINATION OF CHARACTER BY AN ABLEIST, ADA VIOLATING COURT, AND SHE CALLS ME "RETARDED," "CRIPPLED," AND TREATS ME LIKE I'M IN GRAFTON, ND, AND SHE IS VIOLATING THE ADA.

V. ADMINISTRATIVE PROCEDURES. If applicable, state whether your claim was heard by any administrative agencies; the type of proceedings; the date and place of any proceedings; the outcome of any administrative proceedings.

I HAVE REACHED OUT TO HER, SEVERAL TIMES, WITH EMAIL PHONE CALLS, SHE USES BARRIERS OF SILENCE, AND OPPRESSION TO NOT DISCUSS THE ADA VIOLATIONS, OF MONTANA, AND SHE REFUSES TO LET ME TALK TO THE FAMILY, AND MY DAUGHTER, WHO IS STILL MY BIOLOGICAL DAUGHTER, SHE IS VIOLATING MY CIVIL RIGHTS, AND PLACING BARRIERS, SHE REFUSES TO TALK TO ME, AND TREAT ME WITH

DIGNITY, AND INTEGRITY, EVEN THOUGH I JUST GOT A COLLEGE EDUCATION FUND FOR MARISOL →

THROUGH THE BANK OF NORTH AMERICA.
 Senator Judy Lee met with me, AND I'm
 Filing this lawsuit BECAUSE she refuses to
 Have open Dialogue with me, offer, ANY kind of
 Advice, AND SHE'S ACTING FASCISTLY, AND
 LIKE DONALD TRUMP. I sued Shaleesta
 AND the STATE OF MONTANA in Federal court
 See 1) Poulson v. KARPATK, CV:18-160-M-DLC-
 JCL, 2) Poulson v. Bullock CV:17-140-M-DLC-JCL,
 AND I'm NOW Suing her for going with a
 wrongful termination of Parental Rights, placing
 Barriers in my way, telling me THAT "Disabled
 FATHERS cannot be DADS," AND stonewalling
 me like I'm A Jew in Auschwitz, she is
 mean, condescending, Bureaucratic, Hatful, AND
 placing Barriers Between me, AND the Family,
 AND my Biological DAUGHTER, she illegally
 put MARISOL in Foster care, AND ALSO illegally
 adopted her out. she is in-HUMAN, AND IS
 ACTING LIKE A FASCIST NAZI in my Legal
 opinion. - she Discriminates me BECAUSE
 I'm Allegedly Anti-FA, TRUMP LOST! I'm
 NOT A Republican, AND she claims Antifa
 are Terrorists, BUT we aren't. SO SAID THE
 FBI, AND Congress, AN ideology cannot
 Be illegal. YET she follows A murderer TRUMP

She claims to be a "proud girl" and she hates me, she's committing a hate-crime, AND it needs to stop now.


VI. RELIEF. State what you want the Court to do for you.

1. OPEN DIALOGUE WITH MY ADOPTED DAUGHTER MANSOL MIA FERRARI, AND HER FAMILY
2. \$50K for violating the ADA.
3. Julie Hoffman to write AN APOLOGY letter STATING THAT "ANTI-FA FATHER'S ARE THE HEROES," AND THAT I AM NOT A TERRORIST.
4. DENOUNCE TRUMP AND THE REPUBLICAN PARTY, AS THEY ARE THE TERRORISTS

GO JOE BIDEN!

VII. SIGNATURE. Each Plaintiff must individually sign this complaint.

Signed this 05 day of AUGUST, 2021

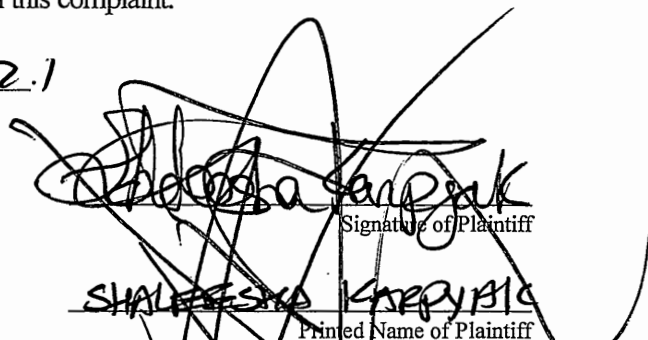

Signature of Plaintiff

K. Ty Poulson
Printed Name of Plaintiff

1520 E Burdick Expressway NE
Mailing Address

Minot, ND 58701
City, State, Zip Code

(406) 226-8606
Telephone Number of Plaintiff


Signature of Plaintiff

SHARESHA KOPYAK
Printed Name of Plaintiff

WATFORD CITY, ND
Mailing Address

WATFORD CITY, ND 58854
City, State, Zip Code

(406) 226-8606
Telephone Number of Plaintiff